



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
NEW ENGLAND REGION
5 POST OFFICE SQUARE, SUITE 100 BOSTON, MA 02109-3912

APR 11 2017

CERTIFIED MAIL

Mark Donahue, Director
DPI Specialty Foods
135 Will Dr.
Canton, MA 02021

Dear Mr. Donahue:

**Re: Reporting Requirement Pursuant to the Clean Air Act
Response Required Within Thirty Days of Receipt**

Dear Mr. Donahue:

EPA is requesting documentation of the total amount of anhydrous ammonia contained within any refrigeration system at DPI Specialty Foods (the "Facility") because the Facility has reported 11,000 pounds of anhydrous ammonia on its Risk Management Program submittal, which exceeds the 10,000-pound threshold for application of the Agency's chemical accident prevention regulations found at 40 C.F.R. Part 68. Section 114(a)(1) of the CAA, 42 U.S.C. § 7414(a)(1), gives EPA the authority to require a company to submit such information as EPA may reasonably require to determine its compliance with the CAA. Responses to the enclosed question(s) (Attachment 2) must be furnished **within thirty (30) days** of your receipt of this letter.

Compliance with this Reporting Requirement is mandatory. Failure to respond fully and truthfully, or to adequately justify any failure to respond, **within thirty (30) days of receipt of this letter** can result in an enforcement action by EPA pursuant to Section 113 of the CAA, 42 U.S.C. § 7413. This statute permits EPA to seek the imposition of penalties. This Reporting Requirement is not subject to Office of Management and Budget review under the Paperwork Reduction Act. Please be further advised that provision of false, fictitious, or fraudulent statements or representations may subject you to criminal penalties.

You may, if you desire, assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 C.F.R. § 2.203(b). You should read the above-cited regulations carefully before asserting a business confidentiality claim, since certain categories of information are not properly the subject of such a claim. If no such claim accompanies the information when it is received by EPA, the information may be made available to the public by EPA without further notice to you.

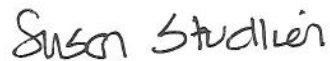
You are required to submit the above-referenced information in writing and by electronic mail to:

Page 2

Mary Jane O'Donnell
Office of Environmental Stewardship (Mail Code OES 05-1)
U. S. Environmental Protection Agency, Region I
5 Post Office Square, Suite 100
Boston, Massachusetts 02109-3912
odonnell.maryjane@epa.gov

As part of your response, please complete the enclosed declaration (Attachment 1) and provide a cover letter answering the question(s) in Attachment 2. If you have any questions with regard to this Reporting Requirement, please contact Mary Jane O'Donnell of my staff at (617) 918-1371.

Sincerely,



Susan Studlien, Director
Office of Environmental Stewardship

Enclosures

ATTACHMENT 1

Instructions: Complete and Include With Your Response

DECLARATION

I declare under penalty of perjury that I am the

_____ of _____,
[Title] [Name of Facility]

that I am authorized to respond on behalf of

_____, and
[Name of Facility]

that the foregoing is a complete, true, and correct response.

Executed on _____
[Date]

[Signature]

[Type Name and Title]

ATTACHMENT 2

QUESTIONS/INFORMATION REQUESTED

EPA is requesting documentation of the total amount of anhydrous ammonia contained within the refrigeration system at the DPI Specialty Foods facility located at 135 Wills Dr., Canton, MA. To provide EPA with the requested information, please provide a detailed explanation of the methodology used to make the inventory determination. Also, please include a copy of calculations performed, ammonia charge records, or any other documentation used to support the inventory amount. Provide sufficient information that an engineer may review the assumptions and calculations used in your estimate.

For your information, there are three methods that are typically used to determine the inventory of anhydrous ammonia in a refrigeration system ("System"). Each method is briefly described below:

- 1) Method 1: Document the ammonia charges to the System:
This method involves estimating the inventory by keeping documentation of all ammonia charges to the System since the original charge. This option is not recommended for systems that have undergone significant changes or ammonia losses.
- 2) Method 2: Document inventory via System pump-down:
This option can be used when the System is shut down for maintenance, and the ammonia is either completely removed from the System or returned to one or more vessels in the system.
- 3) Method 3: Engineering calculations of individual System components to estimate the amount of ammonia in the System: *This method involves performing inventory calculations on the components of the System that contain liquid-phase ammonia, such as pipes, receivers, condensers, surge drums, evaporators, oil coolers, etc.*

Various organizations offer on-line calculators or other resources to help determine inventory amounts, including, for example, the International Institute for Ammonia Refrigeration and the Industrial Refrigeration Consortium.